

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

GAIL CORVELLO, et al.,	)	
Plaintiffs,	)	C.A. No. 05-0221S
	)	(Related Case Nos.: 05-522S,
v.	)	05-274S, 05-370S)
	)	
NEW ENGLAND GAS COMPANY;	)	
SOUTHERN UNION COMPANY	)	
Defendant and	)	
Third-Party Plaintiff,	)	
	)	
v.	)	
	)	
BRIDGESTONE AMERICAS TIRE	)	
OPERATIONS, LLC and	)	
HONEYWELL INTERNATIONAL INC.	)	
Third-Party Defendants.	)	

**JOINT MOTION TO AMEND PRETRIAL ORDER**

Pursuant to Fed. R. Civ. P. 26 and LR Cv. 26, Third Party Plaintiff Southern Union Company/New England Gas Company (collectively, "Southern Union") and Third-Party Defendants Bridgestone Americas Tire Operations, LLC ("Bridgestone") and Honeywell International Inc. ("Honeywell") jointly request that the Court amend its October 15, 2012 Pretrial Order<sup>1</sup> by amending the dates contained therein by approximately forty-five (45) days as follows:

1. All factual discovery closed by: January 15, 2013
2. All expert discovery closed by: July 1, 2013
3. Dispositive motions filed by: July 25, 2013
4. Third-Party Plaintiff expert witness disclosures: March 15, 2013
5. Third-Party Defendants' expert witness disclosures: April 26, 2013

---

<sup>1</sup> Specifically, the Court entered a text order (Doc. 880) on October 15, 2012, granting the parties' prior Joint Motion to Amend Pretrial Order.

6. Pretrial Memoranda, if no dispositive motions: July 25, 2013  
(or 30 days after decision on dispositive motions)

In support of this joint motion, the parties state that Southern Union has now engaged in mediation with both Bridgestone and Honeywell, and has reached settlements in principle with both. The parties are now in the process of preparing and finalizing settlement and related court documents, and request this extension of pre-trial deadlines to allow sufficient time to complete their respective settlement documentation. The parties therefore respectfully request that the Court amend the Pretrial Order by extending the dates as set forth above.

SOUTHERN UNION COMPANY AND  
NEW ENGLAND GAS COMPANY

HONEYWELL INTERNATIONAL INC.

By its Attorneys,

By its Attorneys,

/s/ Robin L. Main

Gerald J. Petros (#2931)  
Robin L. Main (#4222)  
Hinckley, Allen & Snyder LLP  
50 Kennedy Plaza, Suite 1500  
Providence, RI 02903  
Tel. (401) 274-2000  
Fax (401) 277-9600  
gpetros@haslaw.com  
rmain@haslaw.com

/s/ Gregory L. Benik

Gregory L. Benik, Esq. (#1515)  
Benik & Associates P.C.  
128 Dorrance Street, Suite 450  
Providence, RI 02903  
gbenik@jreri.com

David Ross, Esq.  
Seth Davis, Esq.  
Kasowitz, Benson, Torres & Friedman LLP  
1633 Broadway  
New York, New York 10019  
(212) 506-1700

**BRIDGESTONE AMERICAS TIRES  
OPERATIONS, LLC**

By its Attorneys,

/s/ George E. Lieberman

George E. Lieberman, Esq. (#3860)

Kimberly A. Simpson, Esq. (#4803)

Vetter & White

Center Place

50 Park Row West, Suite 109

Providence, RI 02903

Tel: (401) 421-3060

Fax: (401) 272-6803

glieberman@vetterandwhite.com

ksimpson@vetterandwhite.com

William D. Wick, Esq.

Wactor & Wick LLP

180 Grand Avenue, Suite 950

Oakland, CA 94612

Tel. (510) 465-5750

Fax: (510) 465 5697

bwick@ww-envlaw.com

Dated: November 30, 2012

CERTIFICATE OF SERVICE

George E. Lieberman, Esq.  
Benjamin V. White, Esq.  
Kimberly A. Simpson, Esq.  
Timothy M. Bliss, Esq.  
Vetter & White  
Center Place  
50 Park Row West, Suite 109  
Providence, RI 02903

Kerri L. Stelcen, Esq.  
Kerry A. Dziubek, Esq.  
Arnold & Porter LLP  
399 Park Avenue  
36th Floor  
New York, NY 10022-4690

Gregory L. Benik, Esq.  
Benik & Associates  
128 Dorrance Street, Suite 450  
Providence, RI 02903

William D. Wick, Esq.  
Wactor & Wick LLP  
180 Grand Avenue, Suite 950  
Oakland, CA 94612

I hereby certify that on the 30th day of November, 2012, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Robin L. Main

#51029273 (14015/126110)